

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

# UNITED STATES OF AMERICA

V.

**FRANKLIN TREJO-CHAVARRIA,  
a/k/a "Impulsivo,"**

**WILSON JOSE VENTURA-MEJIA,  
a/k/a "Discreto," a/k/a "Disco,"**

**JIMMY VILLALOBOS-GOMEZ,  
a/k/a "Duchi," a/k/a "Duchy,"**

## ANGEL MIGUEL AGUILAR-OCHOA, a/k/a "Darki."

**WALTER ANTONIO CHICAS-GARCIA,  
a/k/a "Walter," a/k/a "Mejia," and**

**MARLON MIRANDA-MORAN,  
a/k/a "Chinki."**

CARLOS ELIAS HENRIQUEZ-TORRES,  
a/k/a "Kalin."

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**CRIMINAL NO. 4:20-CR-00585**

**(Murder in Aid of Racketeering,  
18 U.S.C. § 1959(a)(1); Conspiracy  
to Commit Murder in Aid  
of Racketeering, 18 U.S.C.  
§ 1959(a)(5); and Aiding and  
Abetting, 18 U.S.C. § 2)**

## NOTICE OF INTENT NOT TO SEEK THE DEATH PENALTY

COMES NOW the United States of America, by and through its counsel, Jennifer Lowery, Acting United States Attorney for the Southern District of Texas, John M. Lewis and Britni Cooper, Assistant United States Attorneys, David L. Jaffe, Chief of the Organized Crime and Gang Section of the U.S. Department of Justice, Julie Finocchiaro, Gerald Collins, and Matthew Hoff, Trial Attorneys, hereby notifies the Court and counsel for the Defendants that it does not intend to seek the death penalty against them.

Respectfully submitted,

/s/ John M. Lewis

John M. Lewis  
Britni Cooper  
Assistant United States Attorneys  
United States Attorney's Office  
Southern District of Texas

Julie A. Finocchiaro  
Gerald Collins  
Matthew Hoff  
Trial Attorneys  
Department of Justice  
Organized Crime and Gang Section

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was sent to all counsel of record for each defendant on the date of this filing via ECF notification and electronic mail.

/s/ John M. Lewis  
John M. Lewis  
Assistant United States Attorney  
United States Attorney's Office  
Southern District of Texas